

1 The Honorable Marsha J. Pechman
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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE

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16 ALYSSA IZZO and JOHN WILSON, on
17 behalf of themselves and all others similarly
18 situated,

19 Plaintiffs,

20 v.

21
22 PEOPLECONNECT, INC., a Delaware
23 Corporation,

24
25 Defendant.

26 Case No. 2:22-cv-00016-MJP

27 JOINT MOTION AND PROPOSED
28 ORDER TO EXTEND LIMITED FACT
29 DISCOVERY DEADLINES

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31 NOTE ON MOTION CALENDAR:
32 November 6, 2023

33 Pursuant to Fed. R. Civ. P. 26, Plaintiffs Izzo and Wilson and Defendant PeopleConnect,
34 Inc., by and through their undersigned attorneys, respectfully request the Court to extend the
35 deadline for the Parties to complete arbitration-related discovery to February 26, 2024 and
36 extend the deadline for Defendant to answer or otherwise plead to March 27, 2024.

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38 1. On September 26, 2023, the Court ordered the Parties to complete arbitration-
39 related discovery by December 26, 2023. Dkt. 33. The Court also set deadlines for Defendant to
40 answer or otherwise respond by January 25, 2024. *Id.*
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JOINT MOTION AND PROPOSED ORDER TO EXTEND
LIMITED FACT DISCOVERY DEADLINES - 1
No. 2:22-cv-00016-MJP

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1 2. The Parties have been diligently pursuing arbitration-related discovery. On
 2 September 28, 2023, Defendant served written discovery on Plaintiffs. On October 5, 2023,
 3 Plaintiffs served written discovery on Defendant. Plaintiffs responded on October 30, 2023.
 4 Defendant responded on November 3, 2023.
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6 3. On October 20, 2023, Defendant served third-party subpoenas on Plaintiffs'
 7 counsel in *Boshears v. PeopleConnect, Inc.*, Case No. 21-cv-1222. Plaintiffs and Defendant,
 8 having met and conferred about the third-party subpoenas, have agreed that the Parties should wait
 9 to negotiate the agreed upon scope of any third-party subpoenas and to schedule any third-party
 10 depositions until after Plaintiffs in this matter and in *Boshears* have been deposed.
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12 4. Fed. R. Civ. P. 26 provides the Court with the discretion to set the schedule for
 13 discovery.
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15 5. The Parties thus jointly request that this Court extend the deadlines in its
 16 September 26, 2023 Scheduling Order by 60 days so that the Parties may have adequate time to
 17 negotiate the scope of the third-party subpoenas and take the third-party depositions after the
 18 Plaintiffs have been deposed.
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20 **WHEREFORE**, Plaintiffs and Defendant respectfully requests this Court to extend the
 21 deadline for the Parties to complete arbitration-related discovery to February 26, 2024; and extend
 22 the deadline for Defendant to answer or otherwise plead to March 27, 2024.
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1 DATED this 6th day of November, 2023.
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30 *Attorneys for Defendant PeopleConnect, Inc.*

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34 IT IS SO ORDERED.
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36 DATED: November 7, 2023
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Marsha J. Pechman
United States District Judge